ORIGINAL
(Red)

R-585-7-0-31

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT OF
INTERNATIONAL PAPER COMPANY
PREPARED UNDER

TDD NO. F3-9004-01
EPA NO. PA-2628
CONTRACT NO. 68-01-7346

FOR THE

HAZARDOUS SITE CONTROL DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

OCTOBER 1, 1990

NUS CORPORATION
SUPERFUND DIVISION

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Site Name: International Paper Company
TDD No.: F3-9004-01

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SECTION 1

1.0 INTRODUCTION

1.1 Authorization

NUS Corporation performed this work under Environmental Protection Agency Contract No. 68-01-7346. This specific report was prepared in accordance with Technical Directive Document No. F3-9004-01 for the International Paper Company, Liquid Packaging Division, located in Philadelphia, Pennsylvania.

1.2 Scope of Work

NUS FIT 3 was tasked to conduct an Environmental Priorities Initiative (EPI) preliminary assessment of the subject site.

1.3 Summary

The subject site is the location of the International Paper Company, Liquid Packaging Division, located in Philadelphia, Pennsylvania. The processes at the facility included cutting, sealing, and printing polyethylene-coated paper to produce various sizes of juice and milk cartons. Sixty-inch-diameter polyethylene-coated rolls of paper are cut to the specific sizes, sealed with gluing materials, and tested and printed before they are shipped as a finished product. These products are used by various dairies and juice producers.

Six solid waste management units (SWMUs) have been identified for the site: the printing presses, the sealing machines, the ink storage room, the hazardous waste storage area, the waste oil storage area, and the maintenance shop degreaser. SWMU no. 1 contains waste inks, SWMU no. 2 contains waste adhesives, SWMU no. 3 is the inside storage area for waste inks and adhesives, SWMU no. 4 is the outside storage for all hazardous wastes, SWMU no. 5 contains stored waste oils, and SWMU no. 6 contains degreasers in the maintenance shop. Five of the six SWMUs are hazardous waste management areas. SWMU nos. 1, 2, 3, 4, and 6 currently contain hazardous wastes.

The residents in the study area are supplied with potable drinking water from local municipal water companies. The City of Philadelphia Water Department (CPWD) supplies water to all residents within Philadelphia County in the study area. The Bucks County Water and Sewer Authority (BCWSA) serves the northern part of the study area. The Bensalem Township Municipal Authority (BTMA) serves the eastern portion of the study area. The Philadelphia Suburban Water Company (PSWC) supplies the residents of Montgomery County within the study area. The total population served by these water companies is 184,604.

SECTION 2

2.0 THE SITE

2.1 Location

The International Paper Company, Liquid Packaging Division facility, is located at 2100 East Byberry Road in Philadelphia, Pennsylvania (see figure 2.1, page 2-2). The coordinates of the site are 40° 6' 15" north latitude and 75° 0' 18" west longitude. The site can be located on the United States Geological Survey (U.S.G.S.) Frankford, Pennsylvania quadrangle by measuring 0.5 inch west and three inches south of the northeastern corner of the quadrangle.[1]

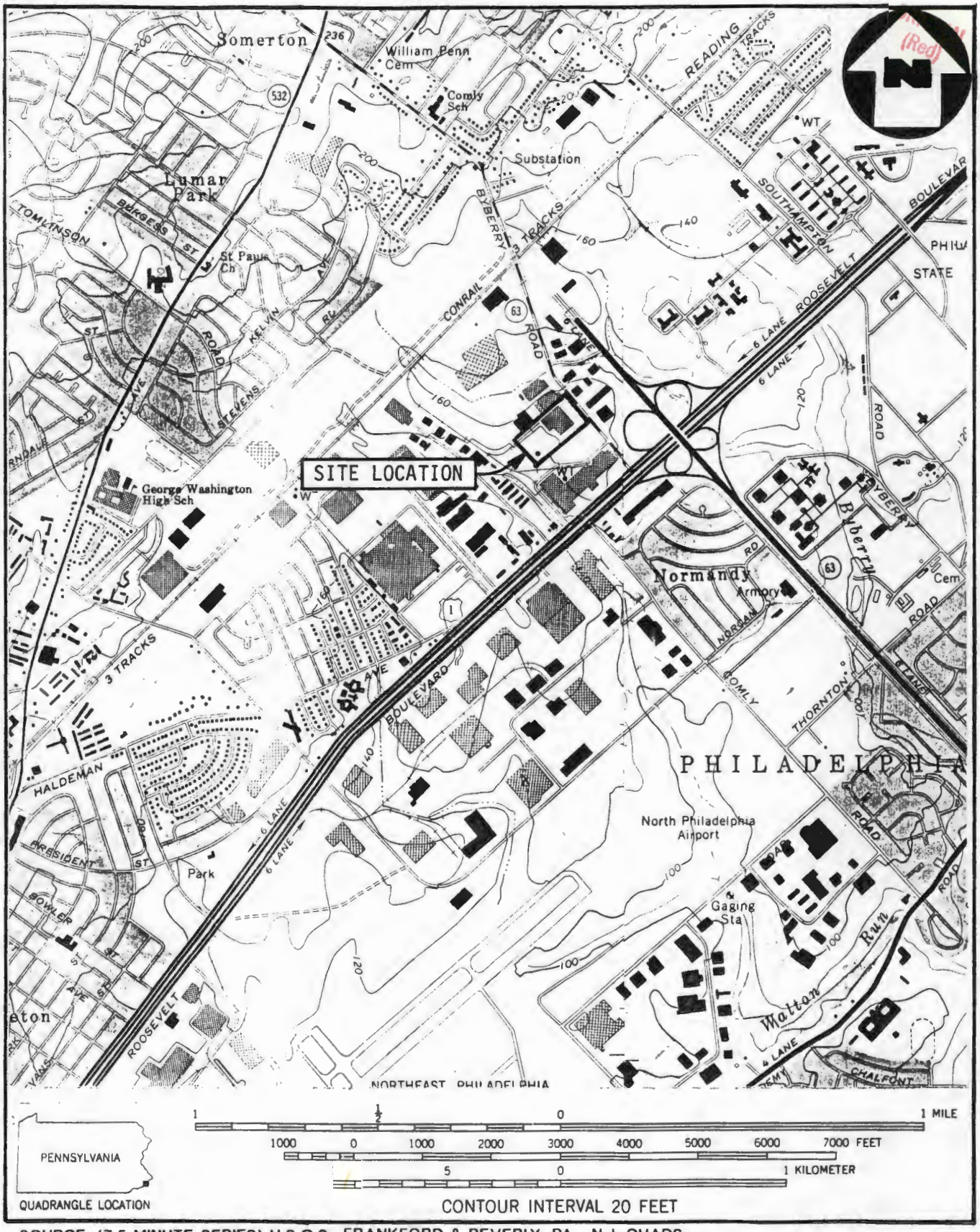
2.2 Site Layout

The Liquid Packaging Division encompasses approximately 16.6 acres (see figure 2.2, page 2-3). Two structures are located on site, a manufacturing building and a hazardous waste storage area. Access to the property is off Byberry Road.[2,3]

The manufacturing building is bordered in the front (to the east) by a parking lot for visitors and office employees. The production employee parking lot borders the manufacturing building to the south. A macadam area used for loading and unloading, the hazardous waste storage area, and the waste oil storage area border the manufacturing building to the west (rear). Railroad tracks enter the property from the west and proceed into the manufacturing building. Imperial Metals borders the site to the north, and Nabisco borders the site to the south. The dimensions of the manufacturing building are 375 by 450 feet. The long axis of the building lies in an east to west orientation.[2,3]

The hazardous waste storage area is located approximately 125 feet southwest of the manufacturing building and is surrounded by a locked 6-feet-high chain-link fence with a rolling gate. This storage area sits on a concrete slab and is surrounded by an 8-inch-high containment curb that is 13 feet, 2 inches by 13 feet, 3 inches.[2,3]

The interior of the manufacturing structure is divided into two areas by a concrete-block wall trending east to west. The northern side of manufacturing area houses the roll-stock storage area, the finished-goods storage area, the railroad-unloading area, the shipping area, the palletizer area, and the maintenance shop. The one area of concern in this portion of the building is the Safety Kleen maintenance shop degreaser.[2,3]



SOURCE: (7.5 MINUTE SERIES) U.S.G.S. FRANKFORD & BEVERLY, PA - N.J. QUADS.

SITE LOCATION MAP

INTERNATIONAL PAPER, PHILADELPHIA, PA

SCALE 1: 24000

FIGURE 2.1

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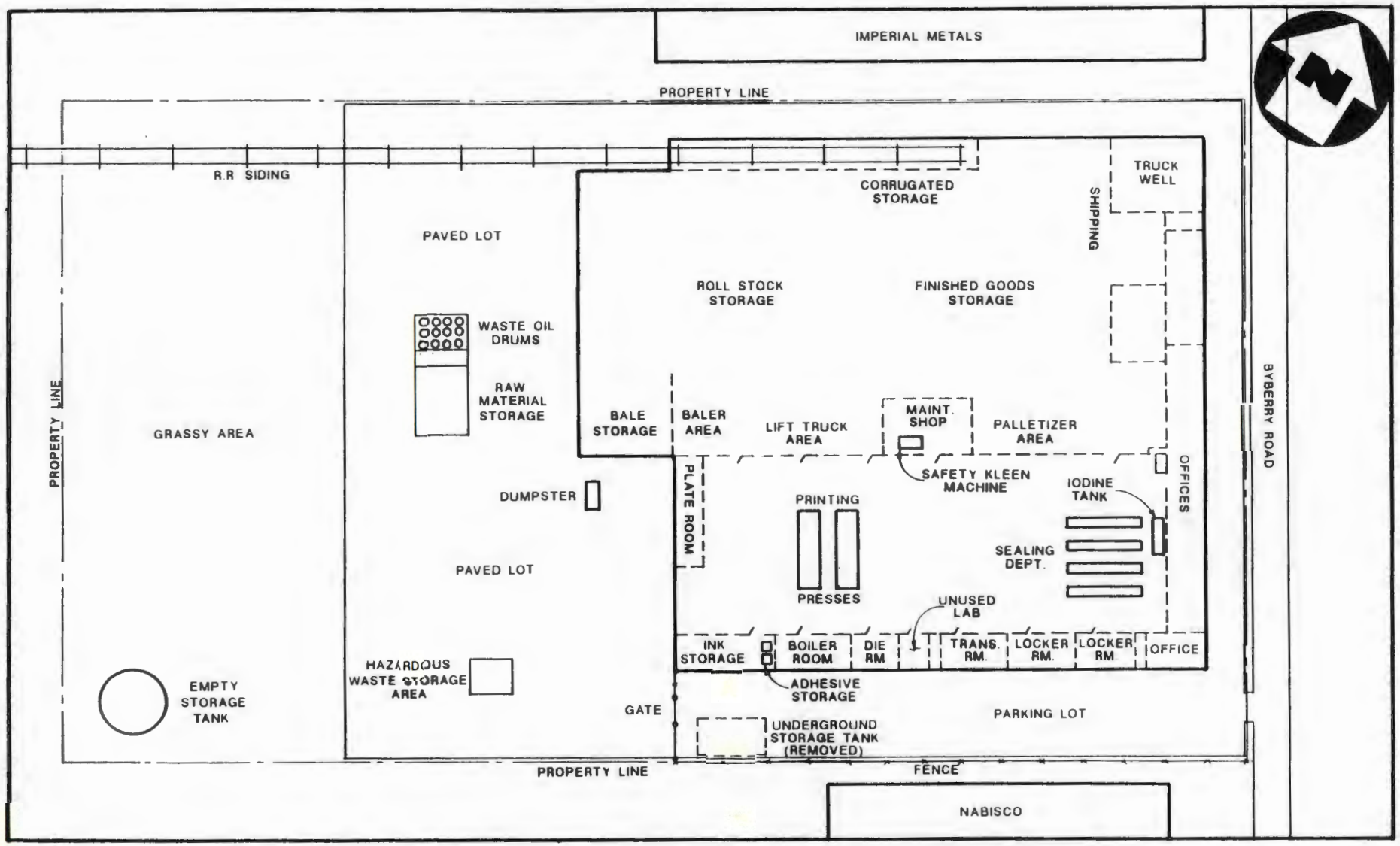

SITE SKETCH

INTERNATIONAL PAPER, PHILADELPHIA, PA

(NO SCALE)

FIGURE 2.2

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The southern side of the manufacturing area houses the plate room, the printing presses, and the sealing department. The ink storage room, the boiler room, the dye room, the unused laboratory, and the locker rooms are located along the southern wall of the manufacturing area. The areas of concern are the printing presses, the sealing machines, and the ink storage room.[2,3]

2.3 Ownership History

The site is currently owned by International Paper Company and is 1 of 10 International Paper Company manufacturing plants in Pennsylvania. International has owned this site since 1954, when the plant was built. It is not known who owned the site or what it was used for before International's ownership, but it is believed to have been farmland.[3]

2.4 Site Use History

International Paper Company, Liquid Packaging Division, has used the site to manufacture milk and juice cartons since the facility was built in 1954.[3]

The polyethylene-coated roll stock is moved by forklift from the storage area to the adhesive area in the western corner of the building. In this area, the adhesives are applied, and the print is engraved by a chrome-plated cylinder. The added print consists of a water-based material that is made of pigments and soluble dyes. The printed pattern is then dried by hot air; the polyethylene roll continues on to be scored along future folds. After it is delivered to the sealing department, the product is fed into a machine that reheats the containers along the lines where glue was previously applied; the containers are then sealed. Also, random containers are tested for their permeability. This is done by way of an iodine dip tank. The finished products are moved to the finished goods area and stored until shipping.[3]

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2.5 Permit and Regulatory Action History

International Paper Company, Liquid Packaging Division, currently generates hazardous wastes under EPA ID No. PAD002282002.[3]

In November 1980, the Liquid Packaging Division filed a General Information Form, a Notification of Hazardous Waste Activity Form, and a Part A Hazardous Waste Permit Application (see appendix A).[4,5,6] Identified hazardous wastes that the facility could handle were classified as D001 (a solid waste that exhibits ignitability), F002 (spent halogenated solvents), F003 (spent nonhalogenated solvents), and F005 (spent nonhalogenated solvents). The process code S02 (tank) was also listed.[4,5]

In December 1980, EPA acknowledged International's Application for Hazardous Waste Permit and notified International that it had fulfilled the requirement for interim status.[7]

A Conditions of Operation During Interim Status document was submitted to International from EPA in July 1981. This document listed the hazardous waste codes and process codes that had been listed on the Notification of Hazardous Waste Activity Form.[8]

In May 1983, G.A. Dell, vice president of International Paper, requested that EPA withdraw the Liquid Packaging Division's status as a treatment, storage, or disposal (TSD) facility of hazardous wastes.[9] In December 1983, EPA acknowledged receipt of the withdrawal request and explained the process for proper withdrawal of the Part A. This process included submission of the Part B or of a letter to EPA indicating that the Part B would not be filed.[9,10]

Although file information is not available to indicate if International followed the withdrawal process delineated by EPA, a letter from William Walsh, of EPA, to Richard Shipman, of the Pennsylvania Department of Environmental Resources (PA DER), lists International as a TSD facility that was in the process of withdrawing its Part A. The letter also stated that this facility must store its wastes for less than days.[11]

In April 1984, PA DER notified International Paper that a determination had been made that International Paper was not a TSD facility and therefore did not need to submit a Part B.[12] PA DER also informed International that the company was not a TSD facility and that International qualified under the permit-by-rule provisions.[12]

International Paper, Liquid Packaging Division, holds the following Philadelphia permits. These permits are re-assigned on an annual basis.[3,13]

-Hazardous Chemical Permit No. E37165
-Flammable Liquid Permit No. 645043
-Flammable Liquid Permit No. 160279 (inside hazardous waste storage area)
-Air Pollution Permit No. 47685 (for paper dust)
-Air Pollution Permit No. 47686 (for printing presses)

In September 1985, a Notice of Violation was issued to International Paper for violations involving container labeling and container management.[14] There is no record of International's or PA DER's action involving these Notices of Violation.

In March 1989, PA DER advised International that its Preparedness, Prevention, and Contingency (PPC) Plan was not properly developed. There is no record of any response to this letter in the file information.[15]

2.6 Remedial Action to Date

Two underground storage tanks were removed from the International Paper property (south of the plant) on November 3, 1988. The capacity of 1 tank was 12,000 gallons, and the capacity of the other tank was 6,000 gallons. File information indicates that the tanks were used to store petroleum liquids. Petro-Tite, Incorporated, of Springfield, Pennsylvania, removed the tanks; the removal was certified by the city of Philadelphia Department of Licenses and Inspections.[3,16,17]

On December 8, 1988, Petro-Tite, Incorporated advised International that it had removed and disposed an underground storage tank from the property in a legal manner.[16] On May 24, 1989, International advised PA DER of the removal of the underground storage tank.[17]

SECTION 3

3.0 ENVIRONMENTAL SETTING

3.1 Water Supply

CPWD supplies water to all residents within Philadelphia County in the study area. CPWD utilizes three surface intakes for its potable water supply. The Baxter Treatment Plant (formerly the Torresdale Treatment Plant) is located on the Delaware River, approximately 4.8 miles south of the site. This intake is tidally influenced; it opens after high tide when the river is flowing out. This is to ensure that potentially poor-quality water released from the downstream Northeast Wastewater Treatment Plant is not withdrawn. CPWD's distribution system is integrated. Although each of the treatment plants has its own dedicated districts, water from different plants can be mixed in the finished water distribution system or in finished water storage facilities. CPWD serves a population of 1.7 million people. In addition, CPWD sells water daily to BCWSA.[1,18,19,20,21]

BCWSA serves Lower Southampton Township in the northern part of the study area. The bulk of BCWSA's water is purchased from CPWD. Groundwater is also drawn from a well located outside the study area in Middletown Township. BCWSA directly serves a population of 10,900 people. BCWSA sells water to several other public water suppliers, one of which, BTMA, is located within the study area.[1,21,22]

BTMA serves the residents of Bensalem Township in the eastern part of the study area. The sole source for BTMA is the water purchased from BCWSA. BTMA serves a total population of 49,700 people.[1,21,23]

BCWSA sells water to several suppliers located outside the study area. In these cases, BCWSA supplements the supply, but it is not the sole source. These customers and their populations served include the Upper Southampton Authority (12,400 people), Middletown Township (14,550 people), the Newtown Artesian/Indian Rock Water Company (9,450 people), and the Northampton Bucks County Municipal Authority (12,000 people).[1,21,22,24]

PSWC supplies water to the residents of Montgomery County within the study area. PSWC obtains water from 6 surface intakes, 1 reservoir, and 39 groundwater wells. Of these, only the Neshaminy Creek surface intake is located within the study area. This intake is located 3.5 miles northeast and upstream of the site. None of PSWC's surface intakes are located within 15 downstream miles of the site. PSWC serves a population of approximately 841,791 people (221,524 residential connections times 3.8 people per connection).[1,21,25,26,27]

3.2 Surface Waters

The on-site water runoff would be expected to flow to the north and enter Byberry Creek. Byberry Creek lies approximately 500 feet from the northern corner of the site. Walton Run is located approximately 900 feet from the southwestern boundary of the property. Walton Run joins Byberry Creek three stream miles downstream; they continue as Byberry Creek. Byberry Creek flows four stream miles downstream until it joins with Poquessing Creek. Poquessing Creek joins the Delaware River 8.2 stream miles from the site.[1]

Byberry Creek is classified as a warm-water fishery. There is no listing for Walton Run.[29]

More than 100 acres of wetlands are located within a 3-mile radius of the site. The wetlands are abundant east of the site, toward the Delaware River, and are rare to the west. The majority of wetlands are classified as palustrine, forested ecosystems. The closest wetlands area to the site greater than five acres in size is classified as a palustrine, forested ecosystem, located along Walton Run, 0.7 stream mile southeast of the site.[29]

3.3 Hydrogeology

The geologic and hydrogeologic conditions in the study area were researched as part of the site investigation. A preliminary literature review was conducted to determine surface and subsurface geologic conditions, soil character, and the status of groundwater transport and storage.

3.3.1 Geology

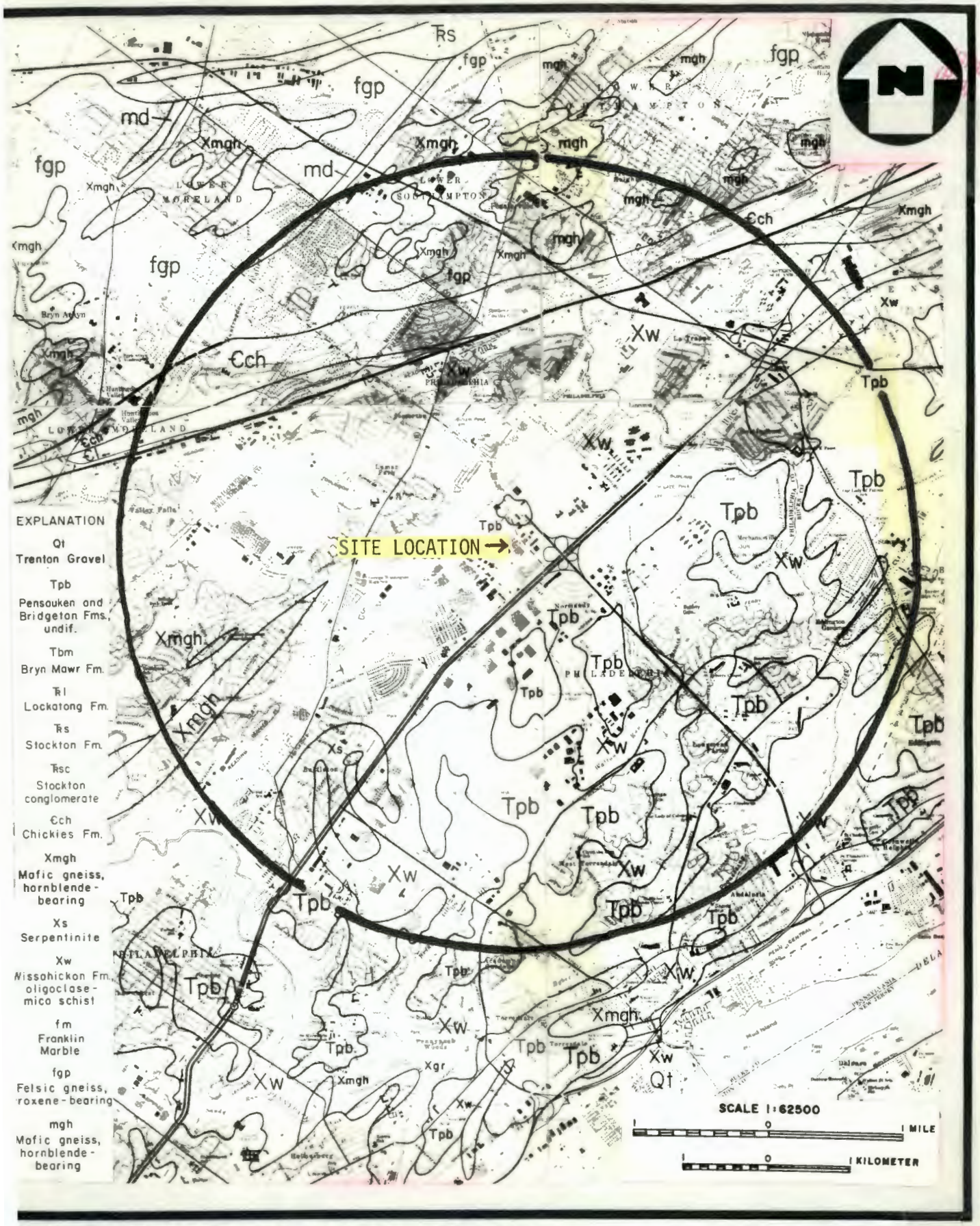
The International Paper site lies within the Piedmont Uplands Section of the Piedmont Physiographic Province. The bedrock of this province consists primarily of Cambrian and Precambrian age crystalline rocks. This is a geologically complex area where tectonic actions, including deformation and igneous activity, have resulted in the juxtaposition of varied rock types. Horizontal and vertical spatial relationships are difficult to discern. Contacts depicted on geologic maps are often approximate due to the lateral variation and intergradation of lithologies. Stratigraphic relationships are often, at best, only hypothetical.[1,30,31,32]

The dominant structural feature within the study area is a thrust fault that strikes through the area at north 70 degrees east. The trace of the fault lies 1.6 miles northwest of the site. Topographically, the province is characterized by low, rounded hills and gentle slopes. The drainage pattern is dendritic.[1,30,31]

The site is underlain by the Precambrian to Cambrian age Wissahickon Formation (see figure 3.1, page 3-4). The Wissahickon is a coarsely crystalline, foliated metamorphic rock of sedimentary origin that texturally ranges from a schist to a gneiss. Generally, the individual schistose and gneissic layers range in thickness from less than an inch to several feet. The schistose layers are excessively micaceous and contain abundant chlorite. Feldspar is abundant in the gneissic layers. Joints are poorly formed, irregular, and widely spaced. The joints are open at the surface but decrease rapidly in width with increasing depth. The estimated thickness of the Wissahickon Formation is 8,000 to 10,000 feet.[30,32,33]

The Cambrian age Chickies and Ledger Formations crop out 1.6 miles northwest of the site. These formations occur in a linear band parallel and adjacent to the thrust fault that strikes through the area. The Chickies Formation is a massively bedded, hard, resistant quartzite underlain by a quartzitic and feldspathic cobble conglomerate. Joints are moderately well developed and moderately abundant in the quartzite. Joints are moderately to highly developed but sparse in the conglomerate. The thickness of the Chickies Formation in the study area ranges from 900 to 1,300 feet.[30,32,33]

The Ledger Formation is a massive, coarsely crystalline dolomite. The middle part of the formation is siliceous. Joints are moderately to well developed and moderately abundant. The Ledger Formation attains a maximum thickness of 2,000 feet but is much thinner in the study area.[30,33]



OURCE: ATLAS OF PRELIMINARY GEOLOGIC QUADRANGLE MAPS OF PENNSYLVANIA

FIGURE 3-1

GEOLOGIC MAP

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The Baltimore Gneiss crops out 1.9 miles north of the site and underlies the far northern portion of the study area. The gneiss is believed to be of both igneous and sedimentary origin. Two facies of the gneiss occur locally. The rock grades from a light gray felsic gneiss to a dark gray mafic gneiss. The felsic gneiss is primarily composed of almost pure quartz-orthoclase with pyroxene, and the mafic gneiss contains large amounts of plagioclase feldspar and ferromagnesian mineral (chiefly hornblende). The contacts shown on figure 3.1 (page 3-4) are approximate, because the facies change is gradational. Joints in both facies are poorly to moderately formed and moderately abundant. The thickness of the Baltimore Gneiss is not known.[30,32,33]

The Tertiary age Pensauken and Bridgeton Formations (undifferentiated) unconformably overlie the crystalline rocks and occur chiefly as outliers in the southeastern portion of the study area. Both formations are unconsolidated, crossbedded deposits of gravel, sand, and clay. These formations are about 30 feet thick in the study area.[30,32,33]

3.3.2 Soils

The soil beneath the site is classified as the Urban land - Chester Complex in zero to eight percent slopes. This complex is composed of 60 percent Urban land, 35 percent Chester soil, and 5 percent other soil. Because they have been disturbed, the physical properties of these soils are extremely variable and site specific. Generally, Chester Series soils are relatively to very permeable (4×10^{-4} to greater than 10^{-3} cm/sec). They are neutral to strongly acid (pH: 7.3 to 5.1). The depth to bedrock typically is between 5 and 10 feet.[34]

3.3.3 Groundwater

Groundwater storage and movement within the study area occur in the primary intergranular pore spaces of the unconsolidated, Tertiary age sediments and the fracture-induced secondary porosity of the crystalline rocks. Fracturing is present in all the stratigraphic units in the area and provides most of the porosity and permeability present in the units. Because these fractures transcend formational or lithologic boundaries, all the units in the study area are considered to be regionally, hydraulically interconnected.[32,33]

The Wissahickon Formation is a fair aquifer. Groundwater storage and movement are restricted to the fracture-induced secondary porosity. These fractures are most abundant and largest near the surface and decrease in size and number with increasing depth. Consequently, most of the groundwater flow occurs in the upper fractured and weathered zone of the formation. Regionally, the Wissahickon Formation has a median yield of 20 gallons per minute (gpm). Nine wells located approximately 1.8 miles northeast of the site were drilled to depths of 48 to 500 feet (mean is 207 feet). These wells yield between 5 and 75 gpm (mean is 38 gpm). A well located 1.1 miles southeast of the site was drilled to a depth of 102 feet and yields 25 gpm.[32,33,35]

Recharge of groundwater in the area is from the infiltration of precipitation through the soil into the fractured crystalline bedrock. Recharge occurs primarily in the topographic highs. Discharge of groundwater is through springs, into wells, or into wetlands or base flow of streams in the topographic lows.[20,32]

Groundwater beneath the site is expected to flow in a southeastward direction, toward the Delaware River, which is the major regional recipient of groundwater discharge in the area. Some groundwater in the unsaturated and shallow groundwater zones may flow either southwestwardly toward Walton Run or northeastwardly toward Byberry Creek. The depth to the water table beneath the site is not known. The well located 1.1 miles southeast of the site has a reported static water level of 16 feet. Water levels within the formation show a strong seasonal variation.[32,33,35]

3.4 Climate and Meteorology

The annual temperature for Philadelphia, Pennsylvania is 54.8°F. The average monthly temperatures range from 21.7°F in January to 77.9°F in July. The average annual precipitation for Philadelphia ranges from 0.62 inches in July to 8.12 inches in April. The mean annual lake evaporation for the area of the site is 35 inches. The net annual precipitation for the site area is approximately 6.4 inches. A 1-year, 24-hour rainfall will produce approximately 2.4 inches of rain.[36,37]

3.5 Land Use

The site is located within a primarily industrial area. International is surrounded by businesses. Imperial Metals Corporation is located northwest of the site, and Nabisco is located southeast of the site. The Comly School is located one mile northeast of the site.[1]

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3.6 Population Distribution

The population distribution within the three-mile radius is as follows:[38]

0 to 1 mile:	6,025
1 to 2 miles:	92,152
2 to 3 miles:	86,426

A total of 184,604 residents live within the 3-mile radius of the site.

These figures were arrived at by using the Rand McNally Commercial Reference Map and Guide for Pennsylvania and the Philadelphia census tract data and by the use of a house count multiplied by 3.8 persons per house.[38]

The area encompassed by the three-mile radius includes the Bustleton, Somerton, and West Torresdale sections of Philadelphia and the Montgomery County suburbs of Philadelphia.[1,38,39]

3.7 Critical Environments

According to the United States Fish and Wildlife Service, two federally listed endangered birds are expected to be found as transient species in the project area. They are the bald eagle (Haliaeetus leucocephalus) and the peregrine falcon (Falco peregrinus). No critical habitat for these species is located in the project area.[40]

The Pennsylvania Natural Diversity Inventory report has not been received at this time.

SECTION 4

4.0 WASTE TYPES AND QUANTITIES

Hazardous wastes generated at the site have been classified by the facility as including EPA RCRA waste identification nos. D001, F002, F003, and F005. The waste codes presented were derived from the subject facility's Part A Hazardous Waste Permit Application and a subsequent Notification of Hazardous Waste Activity. D001 wastes are identified as solid waste that exhibits the characteristic of ignitability, F002 wastes are defined as spent halogenated solvents, F003 wastes are listed as spent nonhalogenated solvents, and F005 wastes are listed as spent nonhalogenated solvents. The waste codes listed may not completely represent all wastes present on site.[3,4,6]

Wastes defined as hazardous by the facility include waste inks from the printing process, waste adhesives from the sealing process, and spent solvents from the Safety Kleen degreasing machine in the maintenance shop.[4,5]

Other wastes include waste oils from various machines and forklifts within the manufacturing building.[3]

4.1 Solid Waste Management Units

Six SWMUs have been identified for the site: the printing presses, the sealing machines, the ink storage room, the hazardous waste storage area, the waste oil storage area, and the maintenance shop degreaser. Five of the six SWMUs are hazardous waste management areas. According to the site representatives, D001 and F003 wastes are managed in SWMU nos. 1, 2, 3, 4, and 6.[3]

4.1.1 SWMU No. 1
Printing Presses

The six printing presses are located in the southern portion of the manufacturing building. The 60-inch polyethylene-coated rolls of paper are brought from the roll storage area and loaded onto the printing presses, which print the labels on the paper. During this process, some waste ink drips into a catch pan. Periodically, these catch pans are emptied; ink that cannot be reused is disposed. These waste inks are carried in the catch pans to the ink storage room and poured into waste storage drums, where the wastes are held until the drums are filled. When filled, the drums are transported outside the building and stored in the hazardous waste storage area (SWMU no. 4) until they are shipped off site.[2,3]

Date of Start-Up

According to Mario Domingues, manager of production services, the printing presses have been used since the plant began operation in 1954.[3]

Date of Closure

The printing presses are still active.[2]

Wastes Managed

Waste ink created during the printing press process drips into a drip pan beneath the press. The "flexo" ink is a water-based liquid ink. It consists of colorants, which may be either pigments or dyes, and a binder. When this pan is full, it is carried to the ink room, where ink is recycled or disposed in the waste storage drums in that room.[2,3]

Release Controls

The wastes are contained in a drip pan. When full, the drip pan is carried to the ink room, and the unusable portion is emptied into the waste storage drums. No floor drains were observed in the concrete floor. An HNU reading of 60 ppm was recorded above the catch pan.[2,3]

History of Releases

No releases from this area have been reported.[3]

4.1.2 SWMU No. 2
Sealing Machines

In the sealing area, an adhesive material is applied to the edges of the cartons; the adhesive material allows the cartons to be opened and re-opened. This glue is cured with heat; scoring is performed on each carton where the edges will be bent. The adhesive material is supplied to the machinery via a one-gallon container. This container is filled in the ink storage room where 55-gallon drums of adhesive are stored. Because the glue sits before it is poured into the sealing machines, sometimes it "goes bad" and must be disposed. If it must be disposed, the waste adhesive is carried to the ink room and emptied into the waste drums.[2,3]

Date of Start-Up

According to Mr. Dominigues, this area has been in operation since the plant start up in 1954.[3]

Date of Closure

The sealing machines are currently in operation.[2,3]

Wastes Managed

When it is determined that the adhesive can no longer be used or it has "gone bad," it is carried to the ink storage room where it is poured into the waste drums. When these waste drums are full, they are transported to the hazardous waste storage area behind the building. Mr. Domingues claims these drums are moved to the outside storage area approximately every three days.[2,3]

Release Controls

No floor drains were observed in the concrete floor beneath the sealing machines.[2]

History of Releases

No releases from this area have been reported.[3]

4.1.3 SWMU No. 3
Ink Storage Room

The waste storage drums are located in the ink storage room. The ink storage room is located along the southern wall of the manufacturing building. Waste inks and adhesives are stored in these drums until they are transported outside to the hazardous waste storage area. One of the drums is designated for liquid waste storage and the other is for solids. These drums are moved outside to the hazardous waste storage area approximately every three days.[2,3]

Date of Start-Up

According to Mr. Domingues, this area has been in operation since the plant start-up in 1954.

Date of Closure

The waste drums are currently being used.[2]

Wastes Managed

Wastes are transported from the printing presses (inks) and sealing department (adhesives). These wastes are placed into the drums, one for liquids and the other for solids. Every three weeks, these drums are transported outside to the hazardous waste storage area.[3]

Release Controls

The wastes are stored in 55-gallon drums sitting horizontal on metal stands. They are located in a separate room within the main manufacturing area. The room has block walls and concrete floors. No drains were observed in the room.[2]

History of Releases

No releases from this area have been reported.[3]

4.1.4 SWMU No. 4
Hazardous Waste Storage Area

The hazardous waste storage area is located in the southern corner of the property, at the rear of the main manufacturing building. All hazardous wastes are stored in this area before they are shipped off site. The area consists of a concrete pad surrounded by a six-feet-high chain-link fence with a rolling gate. A roof covers the storage area, and a containment curb (13 feet, 2 inches by 13 feet, 3 inches by 8 inches) is also found here. An above-ground tank is also located within the storage area, but it is currently not in use.[2,3]

The full drums from the ink storage room are transported every three days to this area for storage until they are transported off site.[2,3]

Date of Start-Up

According to Mr. Domingues, this area has been in use since the plant has been in operation.[3]

Date of Closure

The area is currently in use.[2]

Wastes Managed

All hazardous wastes (ink and adhesives) are stored in this area until they are transported off site. These wastes are transported from inside the manufacturing area approximately every 3 days in 55-gallon drums.[3] During the first quarter of 1990, the following wastes were shipped under EPA RCRA codes D001 and F003, according to site representatives:[3]

Transporter	Quantity
Safety Kleen Linden, New Jersey	3,512 pounds
GSX Laurel, Maryland	6,000 pounds
Petro-Chem Detroit, Michigan	1,600 pounds
Total	11,112 pounds

The FIT observed four 55-gallon drums during the site visit.[2]

Release Controls

The hazardous waste storage area is surrounded by a six-feet-high chain-link fence with a rolling gate. The actual drummed wastes sit on a concrete slab, with a curb containment measuring 13 feet, 2 inches by 13 feet, 3 inches by 8 inches high. This curb containment holds a volume of 115.87 cubic feet (13.25 by 13.25 by 0.66 feet). The volume of liquid in a full 55-gallon drum is 7.35 cubic feet. Therefore, the curb containment will hold 15.76 drums (115.87 cubic feet divided by 7.35 cubic feet per drum).[3] The storage area also has a metal roof.[2]

History of Releases

No releases from this area have been reported.[3]

4.1.5 SWMU No. 5

Waste Oil Storage Area

The waste oil storage area is located northwest of the hazardous waste storage area behind the main manufacturing building. The waste oil drums are stored on wooden pallets that sit directly on the macadam driveway. The waste oils and hydraulic fluid are derived from various pieces of machinery and forklifts used inside the manufacturing area. Most of the machinery in the manufacturing area undergoes periodic oil changes. The waste oil from these changes is placed in 55-gallon drums and transported to the waste oil storage area to be held until it is transported off site.[2,3]

Date of Start-Up

According to Mr. Domingues, this area has been in use since the plant start up in 1954.[3]

Date of Closure

This area is currently active.[2]

Wastes Managed

The waste oils and hydraulic fluid are emptied out of the machinery within the manufacturing building. This oil is placed into 55-gallon drums and transported to the waste oil storage area behind the building. Approximately 1,100 gallons of these waste materials are transported off site each year. The oil and hydraulic fluid are removed by Petro-Con, in Modena, Pennsylvania (EPA PAD981936032).[3,13]

Release Controls

The waste oil drums sit on wooden pallets on the macadam lot. No other release controls exist.[2,3]

History of Releases

No releases from this area have been reported.[3]

4.1.6 SWMU No. 6
Maintenance Shop Degreaser

The maintenance shop degreaser is located in the maintenance shop, which is centrally located in the manufacturing area. The degreaser is a Safety Kleen unit using Safety Kleen solvent 105. The solvent is pumped from storage drums into a tank where the degreasing of parts takes place. The spent degreasing liquids are drawn off the tank and stored in drums before they are transported off site by Safety Kleen, of Fairless Hills, Pennsylvania.[2,3]

Date of Start-Up

According to Mr. Domingues, the Safety Kleen degreasing machine has been in use approximately three years.[3,13]

Date of Closure

The degreasing unit is currently active.[2,3]

Wastes Managed

Safety Kleen solvent 105 is the liquid degreaser used in this unit. It is pumped from a drum into the degreasing basin. Spent degreasing liquids are gravity fed back into the drum and stored before they are transported off site by Safety Kleen. Safety Kleen (EPA ID No. PAD987266715) removes 135 pounds of spent degreasing liquids each quarter (135 pounds times 4 quarters equals 540 pounds each year).[3,13]

Release Controls

The degreasing drums and tanks are located in the maintenance shop within the manufacturing area. The maintenance shop has concrete floors and concrete black walls. No drains were observed in the shop.[2,3]

History of Releases

No releases from this area have been reported.[3]

SECTION 5

5.0 FIELD TRIP REPORT

5.1 Summary

On Thursday, May 3, 1990, NUS FIT 3 members Kim Walters and Paul Persing visited the International Corporation, Liquid Packaging Division, in Philadelphia, Pennsylvania. International representatives James Chartrand, Mario Domingues, and Dennis Hughes granted site access and accompanied the team during the site visit. Weather conditions were partly cloudy, and the temperature was 65°F. Photographs were taken on the site (see figure 5.1, page 5-4, and the photograph log, section 5.4).

5.2 Persons Contacted

5.2.1 Prior to Field Trip

James Chartrand
Plant Manager
International Paper Company
Liquid Packaging Division
2100 East Byberry Road
Philadelphia, PA 19116
(215) 698-4126

Cynthia Steele
PA DER
Norristown
1875 New Hope Street
Norristown, PA 19401
(215) 270-1948

Lynnette Elser
U.S. EPA
841 Chestnut Building
Ninth and Chestnut Streets
Philadelphia, PA 19107
(215) 597-0823

5.2.2 At the Site

James Chartrand
Plant Manager
International Paper Company
Liquid Packaging Division
2100 East Byberry Road
Philadelphia, PA 19116
(215) 698-4126

Mario Domingues
Manager, Production Services
International Paper Company
Liquid Packaging Division
2100 East Byberry Road
Philadelphia, PA 19116
(215) 698-4126

Dennis Hughes
Plant Superintendent
International Paper Company
Liquid Packaging Division
2100 East Byberry Road
Philadelphia, PA 19116
(215) 698-4126

5.2.3 Water Supply Well Information

The entire study area and the site are supplied with water from public water companies. CPWD, BTMA, BCSWA, and PSWC all supply water to residents within the study area. Of those, CPWD serves the largest number of people and the site. No private home wells are located within the study area.

5.3 Site Observations

- The HNU was set on the 0 to 20 scale. The background reading was 0.6 ppm; an HNU reading of 60 ppm was recorded where printing ink wastes were generated.
- The radiation mini-alert was set on the X1 position; no readings above background were recorded.
- A hazardous waste storage area was observed southwest of the main manufacturing building.
- A re-surfaced macadam area was observed in the area where the underground storage tank was supposed to have been located.
- An iodine dip tank was observed in the sealing department.
- An unused laboratory room was observed.
- A Safety Kleen parts degreasing machine was observed in the maintenance shop.
- An empty drum storage and waste oil storage area was observed southwest of the main manufacturing building.
- Railroad cars were observed in the off-load area near the corrugated storage area.

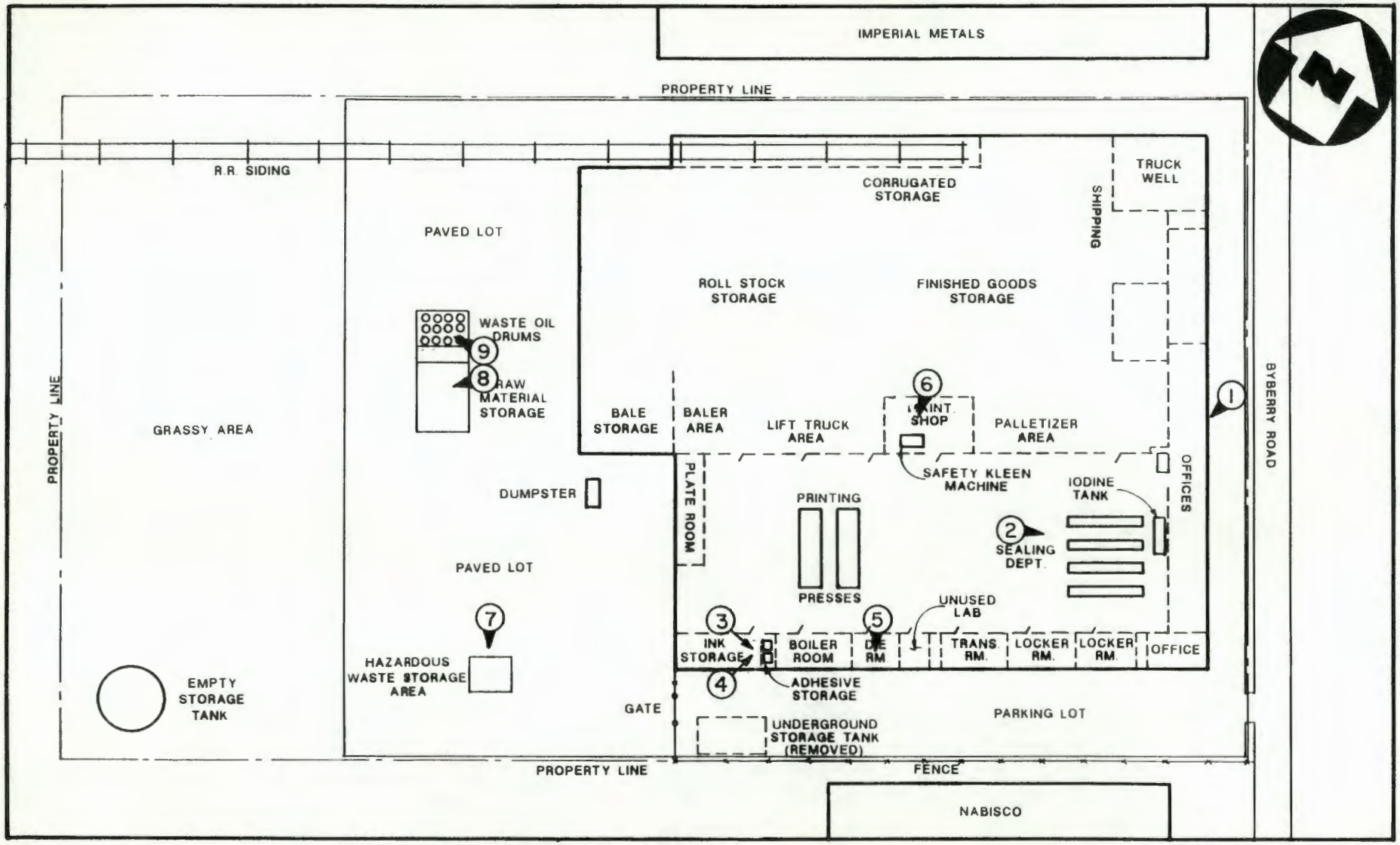

PHOTO LOCATION MAP

INTERNATIONAL PAPER, PHILADELPHIA, PA

(NO SCALE)

FIGURE 5.1

NUS CORPORATION

F3-9004-01

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
PA	2628

ORIGINAL (Red)

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
International Paper Company/ Liquid Packaging Division	2100 East Byberry Lane				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Philadelphia	PA	19116	Philadelphia	101	04

09 COORDINATES LATITUDE	LONGITUDE
46° 06' 15" N	75° 00' 18" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Go east on the Pennsylvania Turnpike to exit 28. Travel south on Roosevelt Boulevard until the fifth traffic signal. Turn right onto Byberry Road. International is the second business on the left.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residence)			
International Paper Company	2100 East Byberry Lane			
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**	
Philadelphia	PA	19116	(215) 698-4190	
07 OPERATOR (If known and different from owner)	**08 STREET (Business, mailing, residence)**			
International Paper Company	2100 East Byberry Lane			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**	
Philadelphia	PA	19116	(215) 698-4190	

13 TYPE OF OWNERSHIP (Check one)

X A. PRIVATE ☐ B. FEDERAL _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

X A. RCRA 3001 DATE RECEIVED: 05 01 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: _____ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

X YES DATE 05 03 90 (MONTH DAY YEAR)

☐ NO

BY (Check all that apply)

☐ A. EPA X ☐ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): NUS Corporation

02 SITE STATUS (Check one)	03 YEARS OF OPERATION		
X A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1954 (BEGINNING YEAR)	still active (ENDING YEAR)	☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The substance possibly present, known, or alleged are waste-printing inks, waste adhesives, waste oils and fluids, and waste degreasers.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Drums are the primary storage for hazardous wastes. These drums are stored in a separate containment shelter with a concrete floor, 6-feet-high chain-link fence border, an 8-inch containment curb, and a metal roof.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) X D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency Organization)			03 TELEPHONE NUMBER
James McCreary	U.S. EPA			(215) 597-1105
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Kim Walters	NUS	FIT 3	(215) 687-9510	05 21 90 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

ORIGINAL (Red)

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

EPA

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
PA	2628

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- _ A SOLID
- _ B POWDER, FINES
- X C SLUDGE
- _ D OTHER (Specify)
- _ E SLURRY
- X F LIQUID
- G GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS 5.6 per quarter

CUBIC YARDS _____

NO. OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- X A TOXIC
- _ B. CORROSIVE
- _ C RADIOACTIVE
- _ D PERSISTENT
- _ E. SOLUBLE
- _ F. INFECTIOUS
- X G. FLAMMABLE
- X H IGNITABLE
- _ I HIGHLY VOLATILE
- _ J. EXPLOSIVE
- _ K REACTIVE
- _ L INCOMPATIBLE
- _ M NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	7,600	pounds	From hazardous storage area.
OLW	OILY WASTE	3,512	pounds	From waste oil storage area.
SOL	SOLVENTS	135	pounds	From maintenance shop area.
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			International representatives claim that
IOC	INORGANIC CHEMICALS			these figures represent normal figures
ACD	ACIDS			for one quarter.
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SLU	sludge (ink and adhesive)	———	drum	unknown	
SOL	solvents	———	drum	unknown	

V. FEEDSTOCKS (See Appendix for CAS Numbers) None.

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

Chartrand James, Mario Domingues, Dennis Hughes, International Paper Company, with (b) (4) , NUS FIT 3. Meeting. May 3, 1990.

EPA FORM 2070-12 (7-81)

ORIGINAL (Red)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE: PA	02 SITE NUMBER: 2628

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 [ ] OBSERVED (DATE ____) [X] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

The waste oil storage area lies near the edge of the macadam. Leakage could flow into soil and groundwater. However, no residents within the study area utilize groundwater.

01 [ ] B. SURFACE WATER CONTAMINATION — 02 [ ] OBSERVED (DATE ____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None reported or observed.

01 [ ] C. CONTAMINATION OF AIR — 02 [ ] OBSERVED (DATE ____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None reported or observed.

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS — 02 [ ] OBSERVED (DATE ____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED ____ — 04 NARRATIVE DESCRIPTION

None reported or observed.

01 [ ] E. DIRECT CONTACT — 02 [ ] OBSERVED (DATE ____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED ____ — 04 NARRATIVE DESCRIPTION

None reported or observed.

01 [ ] F. CONTAMINATION OF SOIL — 02 [ ] OBSERVED (DATE ____) [X] POTENTIAL [ ] ALLEGED
03 AREA POTENTIALLY AFFECTED: 3 (Acres) — 04 NARRATIVE DESCRIPTION

The waste oil drum storage area lacks runoff containment; any spills would flow onto adjacent soils.

01 [ ] G. DRINKING WATER CONTAMINATION — 02 [ ] OBSERVED (DATE ____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None reported or observed.

01 [X] H. WORKER EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE 5/3/90) [X] POTENTIAL [ ] ALLEGED
03 WORKERS POTENTIALLY AFFECTED: 125 employees — 04 NARRATIVE DESCRIPTION

An HNU reading of 60 ppm was recorded at the waste ink station of the printing press.

01 [ ] I. POPULATION EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE ____) [ ] POTENTIAL [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None reported or observed.

ORIGINAL (Red)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
PA	2628

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (Include names(s) of species)

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills, runoff, standing liquids, leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None reported orobserved.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ P. ILLEGAL, UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

None reported or observed.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 125 employees

IV. COMMENTS

None.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Chartrand James, Mario Domingues, Dennis Hughes, International Paper Company, with (b) (4)
NUS FIT 3. Meeting. May 3, 1990.

SECTION 6

ORIGINAL (Red)

6.0 REFERENCES FOR SECTIONS 1.0 THROUGH 5.0

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4. International Paper Company. Notification of Hazardous Waste Activity. OMB No. 158-579016, November 1980.

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ORIGINAL (Red)

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ORIGINAL (Red)

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APPENDIX A

ORIGINAL
(Red)

INTERNATIONAL PAPER COMPANY

INTERNATIONAL PAPER PLAZA
77 WEST 45TH STREET, NEW YORK, NEW YORK 10036

November 18, 1980

HN V. FLYNN
'ector, Environment

PHONE (212) 536-7009

Shirley Bulkin
EPA Region III
P.O. Box 1480
Philadelphia, PA 19107

Dear Ms. Bulkin,

Attached are Part A hazardous waste permit applications for:

Philadelphia Liquid Packaging
Richmond Folding Carton

Please feel free to contact me if you should need additional information.

Thank you.

Very truly yours,

J.V. Flynn

/jry
Attachments

ase print or type in the unshaded areas only
i—in areas are spaced for elite type, i.e., haracters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

RECEIVED
RCRA-SE
EPA REGION III

PAD002282002
Nov 1 1980 000637

ORIGINAL (Red)

LABEL ITEMS

- EPA I.D. NUMBER
- I. FACILITY NAME
- FACILITY MAILING ADDRESS
- II. FACILITY LOCATION

INTERNATIONAL PAPER COMPANY
2100 E. BYBERRY ROAD
PHILADELPHIA, PA 19116

2100 E. BYBERRY ROAD
PHILADELPHIA, PA 19116

I. EPA I.D. NUMBER

F P A D 0 0 2 2 8 2 0 0 2 D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

SKIP I N T E R N A T I O N A L P A P E R C O . L I Q U I D P A C K A G I N G

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
B O N E L L I E F P L A N T M A N A G E R	2 1 5 6 9 8 4 1 2 6

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	
2 1 0 0 E B Y B E R R Y R O A D	
B. CITY OR TOWN	**C. STATE** / **D. ZIP CODE**
P H I L A D E L P H I A	P A / 1 9 1 1 6

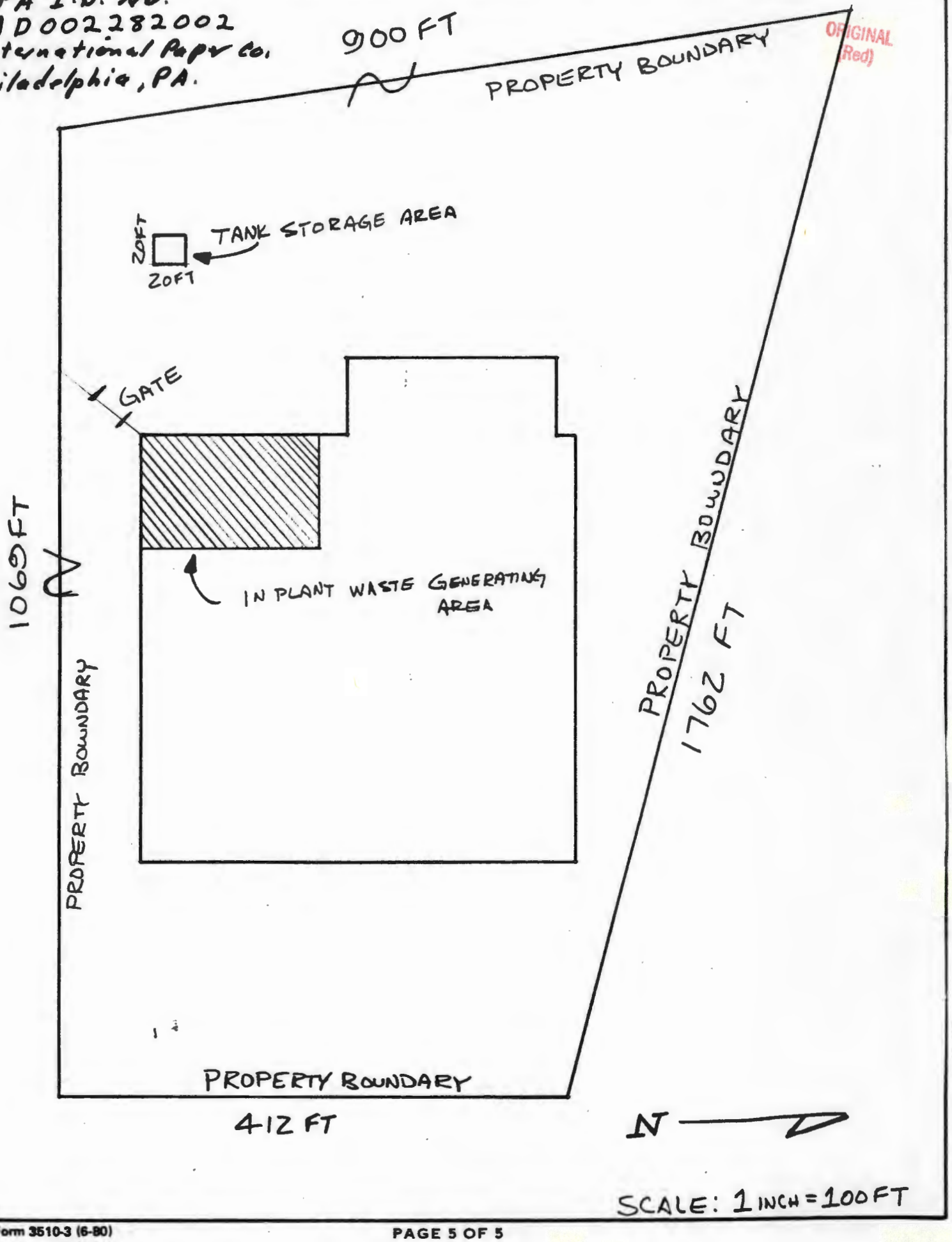
VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
2 1 0 0 E B Y B E R R Y R O A D	
B. COUNTY NAME	
H I L A D E L P H I A	
C. CITY OR TOWN	**D. STATE** / **E. ZIP CODE** / **F. COUNTY CODE (if known)**
P H I L A D E L P H I A	P A / 1 9 1 1 6 /

Form Approved OMB No. 158-S80004

FACILITY DRAWING *(see page*

PA I.D. No.
PAD002282002
International Paper Co.
Philadelphia, PA.



tinued from page 2.
TE: Photocopy this page before completir... you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER *(enter from page 1)*

P	A	D	0	0	2	2	8	2	0	0	2	T/A	C
													1

FOR OFFICIAL USE ONLY

W		D	U	P												T/A	C	2	D	U	P				

. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
	D 0 0 1	11,910	P	S 0 2	
	F 0 0 2				Included with above
	F 0 0 3				Included with above
	F 0 0 5				Included with above

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

ease print or type in the unshaded areas only
ill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

													T/A	C
F	P	A	D	0	0	2	2	8	2	0	0	2		I

1 2 - 13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	ORIGINAL (Red)

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* — 71

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
5 4	0 3	1 3
73 74	75 76	77 78

[ ] 2. NEW FACILITY *(Complete item below.)* — 71

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
73 74	75 76	77 78

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS — 72

[ ] 2. FACILITY HAS A RCRA PERMIT — 73

III. PROCESSES – CODES AND DESIGN CAPACITIES

PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP T/A C I — 13 14 15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
	S 0 2	500	G		7				
					8				
					9				
					10				

ORIGINAL
(Red)

IN

EPA I.D. No.
PAD002282002
International Paper Co.
Philadelphia, PA.

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

ORIGINAL (Red)

EPA
U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

IL LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
T/A: C = 1		

I. NAME OF INSTALLATION

INTERNATIONAL PAPER COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 2100 E BYBERRY ROAD

CITY OR TOWN	ST.	ZIP CODE
PHILADELPHIA	PA	19116

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 2100 E BYBERRY ROAD

CITY OR TOWN	ST.	ZIP CODE
PHILADELPHIA	PA	19116

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
BONELLI E F PLANT MANAGER	215-698-4126

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: INTERNATIONAL PAPER COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: PAD002282102

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

ORIGINAL
(Red)

APPENDIX B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

ORIGINAL (Red)

EPA I.D. # PAD002282002

December 18, 1980

International Paper Co.
Mr. E.F. Bonelli
2100 E. Byberry Rd.
Phila., Pa. 19116

Re: Acknowledgment of Application for a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

APPENDIX C

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

ORIGINAL (Red)

JUL 23 1981

Mr. G. A. Dell
International Paper Company-Liquid Packaging
2100 E. Byberry Road
Philadelphia, PA 19116

Dear Mr. Dell:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

ORIGINAL
(Red)

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Shirley D. Bulkin
Chief, Administrative Support Section
Permit Enforcement Branch

Enclosure

APPENDIX D

INTERNATIONAL PAPER COMPANY
INTERNATIONAL PAPER PLAZA
77 WEST 45TH STREET, NEW YORK, NEW YORK 10036

NSUMER PACKAGING GROUP
EN A. DELL
e President & Group Executive

PHONE (212) 536-6036

ORIGINAL (Red)

May 23, 1983

U.S. Environmental Protection Agency
Region III
6th & Walnut Streets
Philadelphia, Pennsylvania 19106

Attention: Ms. Shirley Bulkin
Permit Contact

Re: Withdrawal of Hazardous Waste TSD Facility Status
International Paper Company
Liquid Packaging Facility
Philadelphia, Pennsylvania
EPA I.D. No. PAD 002282002

Dear Ms. Bulkin:

The subject facility generates a printing ink/solvent waste which is identified as hazardous under RCRA. In 1980, it was determined that the facility should be identified not only as a generator of hazardous waste but also as a TSD (storage) facility due to our inability at the time to foresee whether or not the facility could readily have its waste disposed of in less than 90 days. Consequently, as a precautionary measure, Notification of Hazardous Waste Activity and Part A - Hazardous Waste Permit Application were submitted to your Agency in 1980 identifying the facility as a generator and as a storer of hazardous waste.

It has now been determined that the facility can routinely have its hazardous waste removed from the site for proper disposal in less than 90 days. International Paper Company therefore herewith requests withdrawal of the Notification as a hazardous waste TSD facility and the Part A - Hazardous Waste Permit Application for this facility. International Paper Company does, however, wish to retain hazardous waste generator status and the EPA I.D. number for this facility.

Enclosed is a completed subsequent Notification of Hazardous Waste Activity identifying this facility only as a generator of hazardous waste.

APPENDIX E

UNITED S .TES ENVIRONMENTAL PROTECTION GENCY

ORIGINAL
(Red)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Glenn A. Dell
V.P. Consumer Packaging Group
International Paper Company, Liquid Packaging
2100 E. Byberry Road
Philadelphia, PA 19116

Re: Facility Name: International Paper Company - Liquid Packaging - Philadelphia
I. D. # PAD 00 228 2002

Dear Mr. Dell:

On May 23, 1983 the Environmental Protection Agency received correspondence from your facility requesting withdrawal from the Hazardous Waste program as a treat, store, or disposal facility.

It is a policy that EPA will go through specific procedures to terminate interim status for facilities who wish to withdraw their Part A of the application for a RCRA permit. The first step in the procedure is to call-in Part B of the application for a permit. Therefore, this letter constitutes a formal request for Part B of your application for a hazardous waste management facility permit under the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. This request is made under the authority of regulation 40 CFR §270.

If it is your decision, as you indicated in your letter, to withdraw from the system, then please send EPA a letter stating that you are not going to submit a Part B for a RCRA permit within 30 days upon receipt of this letter. We will then continue with the procedures for termination of interim status. However, if you should decide to pursue a RCRA permit and will submit a Part B, it will be due to EPA no later than June 15, 1984.

If you have any questions, please do not hesitate to call Ms. Shirley Bulkin, a member of my staff, at (215) 597-4269.

Sincerely,

Stephen R. Wassersug, Director
Air and Waste Management Division

cc:
~~Gary Calide~~
~~PA DER, Harrisburg~~
Wayne L. Lynn
PA DER, Norristown

CONCURRENCES

						3AW30	
Wayne L. Lynn							
PA DER, Norristown		12/12	12/12	12/13/83	12/13	12/13/83	

1320-1 (12-70) OFFICIAL FILE COPY

Iteration Appl
(Exp 2/28/2002

CHECKLIST

CONFIDENTIAL INFORMATION IS CONTAINED

ORIGINAL (Red)

Activity	Date Initiated	Date Completed	Project Officer	Comment
Existing Facilities				
t A received	11/19/81			
t B requested	12/15/83			
t B received				
Facilities Only				
: A and B Received				
)leteness Determinations				
: and project decision				
:dule mailed out for major facilities				
Facilities				
ewed for required rmation (against :klist on Part B :ents				
ested additional rmation				
ived more data ired to make permit ance decisions				
tional information ested				
tional information ived				
er sent confirming ission of complete ication				
ic Notice of draft it or intent to published				
ic comments due				
ic comments forwarded dministrative record				
ic Hearing requested				
ic Hearing held				
it Issued/Denied				

APPENDIX F

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

ORIGINAL (Red)

JUL 25 1983

Mr. Richard Shipman
PA Department of Environmental Resources
Division of Hazardous Waste Management
Compliance Section
P.O. Box 2063
Harrisburg, PA 17120

Dear Rick:

The attached list represents another group of TSD facilities which are withdrawing their Part As. Please verify their claims. None of these sites are EPA Part B call-ins. Thanks again for your cooperation in these matters.

Sincerely yours,

William L. Walsh

William L. Walsh
Environmental Protection Assistant
Waste Enforcement Section

Attachment

cc: Joanne McKernan (3AW32)
Jim Webb (3AW22)
Greg Koltonuk (3AW22)
[redacted]

REGION I-NORRISTOWN

ORIGINAL (Red)

Allentown Paint Mfg. Co., Inc.-Allentown-PAD 00 239 1969-7/1/83 letter from Norristown to the facility states that they are not a TSD. Why?

Arrow International Inc.-Wyomissing-PAD 07 283 1415-5/17/83 letter to DER's central office states that the facility will not store for less than 90 days.

Chemical Leaman Tank Lines Inc.-Nazareth-PAD 09 942 7908-6/3/83 letter to Gary Galida states that the facility would like to be classified as a generator only.

Continental Can Co.-Plant #479-Temple-PAD 00 080 0193-6/28/83 letter to Ken Caputo states that the site is a small quantity generator which stores under 90 days.

Diversified Printing Corp.-Atglen-PAD 05 139 7768-7/6/83 letter from Norristown office to facility states that the site is not a TSD. Why?

General Electric Co.-Allentown-PAD 00 300 1732-Same as above.

International Paper Co.-Philadelphia-PAD 00 228 2002-5/23/83 letter to EPA states that the facility stores for less than 90 days.

REGION III - HARRISBURG

SCM Proctor-Silex-Altoona-PAD 04 586 7702-10/14/82 letter to EPA states that the facility was working with the Harrisburg regional office to determine if its treatment qualified as a totally enclosed treatment system. However, their Part A shows treatment impoundments. What is the situation at this site?

REGION IV-WILLIAMSPORT

Continental Can Co.-Plant #420-Milton-PAD 00 080 0177-6/28/83 letter to Ken Caputo states that the facility is a small quantity generator which stores under 90 days.

REGION V-PITTSBURGH

Carnegie Mellon Univ.-Bushy Run Ctr.-Export-PAD 98 055 0354-7/6/83 letter to Chuck Duritsa states that the facility stores for less than 90 days.

Lenox Crystal Inc.-Mount Pleasant-PAD 00 433 2300-5/5/83 letter to DER's central office states that the facility's treatment qualifies for a permit-by-rule and their storage is for less than 90 days.

APPENDIX G

Department of Environmental Resources

ORIGINAL (Red)

1875 New Hope Street
Norristown, PA 19401
215 270-1920

September 13, 1985

J. J. Chartrand, Plant Manager
International Paper Company
2100 Cyberry Road
Philadelphia, PA 19116

Re: Hazardous Waste Inspection
PAD[redacted]2282062
September 9, 1985

NOTICE OF VIOLATION

Dear Mr. Chartrand:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(f)(1)(iii) Containers of 110 gallons or less marked with required Pennsylvania label.

75.262(g)(1)(ii) Wastes stored in proper containers and properly marked and labeled.

75.262(g)(1)(iv) Containers clearly marked with accumulation date and visible for inspection.

75.262(g)(1)(ii) Containers managed in accordance with 75.265(q).

55 gallon drums used for hazardous waste holding are required to have a Pennsylvania Hazardous Waste label showing the accumulation date of contents, old labels should be removed when drums are pumped out. Drums can be held in curbed holding area provided adequate volume exists within the curb exists, refer to 75.265(q)(10)(iii) and 75.265(r)(5). Review of existing PPC plan on-site at time of inspection indicates an up-date is necessary. This was discussed with Mr. John McDonough.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1920.

Very truly yours,

MMB

MICHAEL M. BOREK
Solid Waste Specialist

cc: C. Bonner
G. Danylik
Division of Compliance & Monitoring (2)
Re 30 3256.2

SEP 19 1985

APPENDIX H

ORIGINAL (Red)

Petro-Tite Inc.

155 Broadview Drive • Springfield, PA 19064 • (215) 729-3220 • (215) 446-5906

FILE Environmental

ORIGINAL

UNDERGROUND TANKS

MARIO

CERTIFICATION OF PROPER DISPOSAL
USED PETROLEUM LIQUID STORAGE TANKS

The undersigned hereby declares that he has disposed of the tanks removed from the property of International Paper Co., Inc., hereinafter known as "the Company" located at 2100 E. Byberry Ave. Philadelphia, in the County of Philadelphia and State of Pennsylvania, in a manner consistent with all applicable federal, state and local laws governing such disposal.

The undersigned further certifies that the Company has notified him of the previous use of the tank in the storage of toxic, explosive, flammable petroleum liquids, and that it is sold only as scrap in the case of a metal tank, he having rendered it useless as a storage vessel by mechanical rending of its walls. In the case of fiberglass tanks, the undersigned certifies that the tank is sold as scrap or it must be recertified by the manufacturer before ANYONE can re-use for fuel storage, whichever is appropriate.

The undersigned assumes all risk with respect to the TANK and will indemnify and save the Company harmless from all claims and liability of every kind in any way connected with its use of or existence.

Signed at International Paper, this 8 day of December, 1988.

In the presence of:

James J. Chartrand
(Signed)

James J. Chartrand
(Type or Print Name)

William H. Marryott
(Signed)

William H. Marryott
(Type or Print Name)

APPENDIX I

INTERNATIONAL PAPER

ORIGINAL (Red)

JAMES J. CHARTRAND
PLANT MANAGER
LIQUID PACKAGING DIVISION

PHONE (215) 698-4126

May 24, 1989

Ms. Lori Showers
Department of Environmental Resources
Permits and Compliance
P.O. Box 2063
Harrisburg, PA 17120

RE: Removal of Underground Storage Tanks
Philadelphia Liquid Packaging Facility

Dear Ms. Showers:

Enclosed is an amended copy of Notification for Underground Storage Tanks for this facility which was submitted to your office in March, 1986.

This is to advise that Tank No. 1, described in the Notification, was removed from the ground on November 3, 1988, for disposal.

If there are any questions or if additional information is required, please contact me.

Sincerely,

Jim Chartrand
Plant Manager

Enclosure

lotification for Underground Storage Tanks

FOR UNKS IN PA

RETURN COMPLETED FORM TO: PA Dept. of Environmental Resources, Bureau of Water Quality Management/GW Unit, P.O. Box 2063, Harrisburg, PA 17120 (717) 787-2666

I.D. Number — STATE USE ONLY — CP4

Date Received — Rec'd 4/14/86 RES/a

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been ed to store regulated substances since January 1, 1974, that are in the ground as of ry 8, 1986, or that are brought into use after May 8, 1986. The information requested required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), mended.

The primary purpose of this notification program is to locate and evaluate underound tanks that store or have stored petroleum or hazardous substances. It is pected that the information you provide will be based on reasonably available ords, or, in the absence of such records, your knowledge, belief, or recollection

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless empted, owners of underground tanks that store regulated substances must notify ignated State or local agencies of the existence of their tanks. Owner means— a) in the case of an underground storage tank in use on November 8, 1984, or ught into use after that date, any person who owns an underground storage tank d for the storage, use, or dispensing of regulated substances, and

b) in the case of any underground storage tank in use before November 8, 1984, no longer in use on that date, any person who owned such tank immediately before discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or mbination of tanks that (1) is used to contain an accumulation of "regulated subces," and (2) whose volume (including connected underground piping) is 10% or re beneath the ground. Some examples are underground tanks storing: 1. gasoline, l oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to ification. Other tanks excluded from notification are:
rm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel noncommercial purposes;
nks used for storing heating oil for consumptive use on the premises where stored;
ptic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed $10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must by completed for h location containing underground storage tanks. If more than 5 tanks are owned at this location, tocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached: ☐

I. OWNERSHIP OF TANK(S)

er Name (Corporation, Individual, Public Agency, or Other Entity)
ternational Paper Company

t Address
00 East Byberry Road

ty
iladelphia

State: PA — ZIP Code: 19116

iladelphia

Code: 5 — Phone Number: 698-4100

of Owner (Mark all that apply ☒)

Current: ☐ State or Local Gov't; ☒ Private or Corporate
Former: ☐ Federal Gov't (GSA facility I.D. no. _____); ☐ Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here ☒)

Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest) — State — ZIP Code

Indicate number of tanks at this location: ☐

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands: ☐

III. CONTACT PERSON AT TANK LOCATION

(If same as Section I, mark box here ☐)

ise Markham — Job Title: Project Engineer — Area Code: 215 — Phone Number: 698-4160

IV. TYPE OF NOTIFICATION

☒ Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

tify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached rments, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the nitted information is true, accurate, and complete.

and official title of owner or owner's authorized representative: J. Chartrand, Plant Manager

Signature: James Chartrand

Date Signed: 4/9/86

CONTINUE ON REVERSE SIDE

ner Name (from Section I) International Paper Company Location (from Section II) _____ Page No. 1 of 1 Page

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 1	Tank No.	Tank No.	Tank No.	Tank No.
Status of Tank (Mark all that apply ☒)					
Currently in Use	X				
Temporarily Out of Use					
Permanently Out of Use					
Brought into Use after 5/8/86					
Estimated Age (Years)	23				
Estimated Total Capacity (Gallons)	6,000				
Material of Construction (Mark one ☒)					
Steel					
Concrete					
Fiberglass Reinforced Plastic					
Unknown	X				
Other, Please Specify					
Internal Protection (Mark all that apply ☒)					
Cathodic Protection					
Interior Lining (e.g., epoxy resins)					
None					
Unknown	X				
Other, Please Specify					
External Protection (Mark all that apply ☒)					
Cathodic Protection					
Painted (e.g., asphaltic)					
Fiberglass Reinforced Plastic Coated					
None					
Unknown	X				
Other, Please Specify					
Piping (Mark all that apply ☒)					
Bare Steel					
Galvanized Steel					
Fiberglass Reinforced Plastic					
Cathodically Protected					
Unknown	X				
Other, Please Specify					
Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)					
a. Empty					
b. Petroleum					
Diesel					
Kerosene					
Gasoline (including alcohol blends)					
Used Oil					
Other, Please Specify					
c. Hazardous Substance	X				
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No.	denaturedalcohol				
Mark box ☒ if tank stores a mixture of substances					
d. Unknown					
Additional Information (for tanks permanently taken out of service)	REMOVED				
a. Estimated date last used (mo/yr)	/	/	/	/	/
b. Estimated quantity of substance remaining (gal.)					
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)					

TANK REMOVED 11/05/86

ORIGINAL (Red)

TERNATIONAL PAPER
ENVIRONMENTAL SERVICES–EAST

6075 THE CORNERS PARKWAY
SUITE 108
NORCROSS, GA. 30092
(404) 447-1474

Phil Please type up & I will sign
ol copy. T

ORIGINAL (Red)

CT: Notification of Removal of Underground Storage Tanks

DATE: May 17, 1989

TO: Jim Chartrand
Philadelphia Liquid Packaging

Regulations require that your Department of Environmental Resources be notified of the removal of registered underground tanks.

Enclosed is a draft cover letter and a marked-up copy of the Notification for Underground Storage Tanks which was submitted to the State for your facility in 1986.

Please have the letter typed on your letterhead and submit, with the enclosed Notification form, to the Department of Environmental Resources.

Please send me a copy of the submission for our files.

Sven Thesen

Sven Thesen

RECEIVED
MAY 19 1989
LIQUID PACKAGING
PHILADELPHIA

ST:plb
Enclosure

cc: M. Dominques
O. A. Fick
A. M. Lindsey

01259060

DRAFT

ORIGINAL (Red)

Ms. Lori Showers
Department of Environmental Resources
Permits and Compliance
P. O. Box 2063
Harrisburg, PA 17120

RE: Removal of Underground Storage Tanks
Philadelphia Liquid Packaging Facility

Dear Ms. Showers:

Enclosed is an amended copy of Notification for Underground Storage Tanks for this facility which was submitted to your office in March 1986.

This is to advise that Tank No. 1, described in the Notification, was removed from the ground on November 3, 1988 for disposal.

If there are any questions, or if additional information is required, please contact me.

Sincerely,

Jim Chartrand
Plant Manager

Enclosure

ORIGINAL (Red)

CITY OF PHILADELPHIA
DEPARTMENT OF LICENSES AND INSPECTIONS

PERMIT NO.
00020

THE INSTALLATION OF REMOVAL OF
(1) 12,000 GAL & (1) 6,000 GAL TANK

LOCATION
2100 BYBERRY RD

HAS BEEN INSPECTED WITH THE FOLLOWING RESULTS:
☑ APPROVED AND READY FOR BACK FILL ☐ NOT APPROVED AND NOT READY FOR BACK FILL

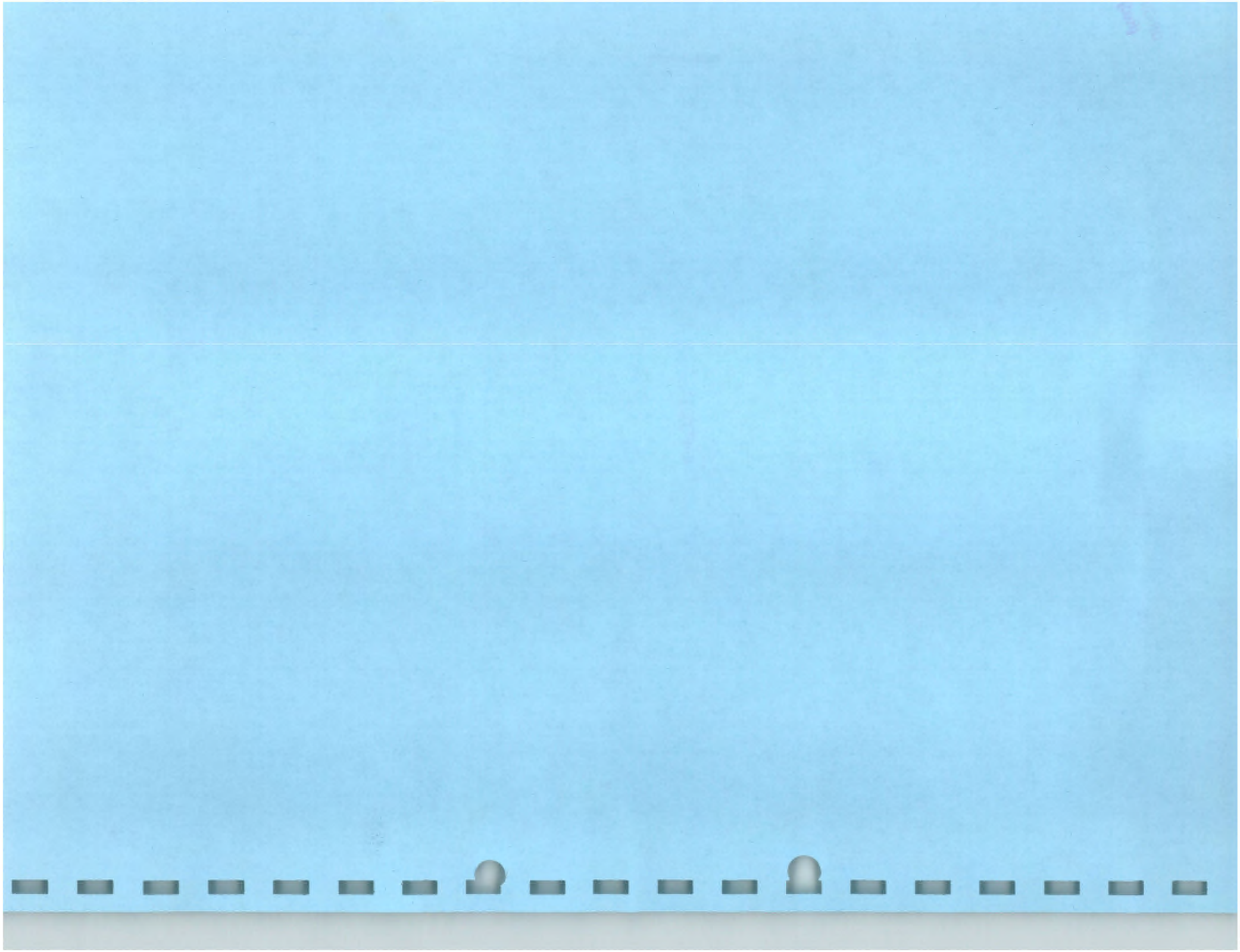
RECOMMENDATIONS:

INSPECTOR Daniel Sampson

DATE 11-3-98

01-009

APPENDIX J



INTERNATIONAL PAPER

LIQUID PACKAGING DIVISION

PHONE (215) 698-4100

October 28, 1989

PA Department of Environmental
Resources
1875 New Hope Street
Norristown, PA 19401

RE: ID #5-115391

Dear Sir:

This facility no longer owns any underground or aboveground tanks used to contain regulated substances. Two underground tanks were removed from this facility in November 1988, and cut up for scrap.

The Department of Environmental Resources was notified and the City of Philadelphia inspected the site during excavation.

Sincerely,

Mario F. Domingues
Manager - Production Services

MFD:rhb

cc: Gil Sheerer
Jim Chartrand
Jim Taaffe

ORIGINAL (Red)

CITY OF PHILADELPHIA
DEPARTMENT OF LICENSES AND INSPECTIONS

PERMIT NO.
00020

THE INSTALLATION OF REMOVAL OF
(1) 12,000 GAL & (1) 6,000 GAL TANK

LOCATION
2100 BYBERRY RD

HAS BEEN INSPECTED WITH THE FOLLOWING RESULTS:
☑ APPROVED AND READY FOR BACK FILL ☐ NOT APPROVED AND NOT READY FOR BACK FILL

RECOMMENDATIONS:

INSPECTOR Daniel [illegible]

DATE 11-3-98

L-808

1-11:10/89
N OF WATER QUALITY MANAGEMENT

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

GISTRATION OF STORAGE TANKS

CORDANCE WITH SECTIONS 303 AND 503 OF THE STORAGE TANK AND SPILL PREVENTION ACT, OWNERS OF REGULATED GE TANKS ARE REQUIRED TO REGISTER THEIR TANKS WITH THE DEPARTMENT AND TO PAY A REGISTRATION FEE.

STATE USE ONLY DATE RECEIVED: 11/1/89 ORIGINAL (Red)

AMOUNT RECEIVED: 0

INSTRUCTIONS

Use type or print in ink all items except "Signature" in Section V. This form is to be completed for each FACILITY which has regulated storage tanks. Where are more than 10 underground or aboveground tanks, photocopy the reverse side of this form, and staple continuation sheets to this form.

tion I. Owner Information - Name, business mailing address and phone number of OWNER of the storage tank(s) at the facility. Please include county and Federal Identification Number, if none include your Social Security Number.

tion II. Type of Owner - Mark the appropriate box.

tion III. Facility Information - Name and physical location (not P.O. Box) of FACILITY. Please include county and township in which FACILITY is located. Include the Facility Identification No. if known.

tion IV. Type of Facility - Mark the appropriate box, if applicable.

tion V. Description of Storage Tanks - This section is for recording information about each regulated storage tank at the facility. Information for aboveground tanks is to be recorded in Part A. Information for underground tanks is to be recorded in Part B.

1. Tank Registration Number - The registration numbers to be recorded for underground tanks are "001", "002", "003", etc. The registration numbers to be recorded for aboveground tanks are "001A", "002A, "003A", etc. The "A" has already been printed on the form for your convenience
2. Status - Indicate whether the tank is currently in use, temporarily out of use, or permanently out of use. Permanently out of use means properly closed in place with an inert solid material. Do not include tanks which have been removed.
3. Date of Installation - Specify the month and year the tank was completely installed. For instance, "0190", for January, 1990. If unknown, write "0000".
4. Capacity - Specify the total design or maximum capacity of the tank in GALLONS. If unknown, write "unknown".
5. Substance Currently or Last Stored - Indicate the substance(s), currently or last stored. If a hazardous substance, please indicate CERCLA Name and CAS Number. If Other is indicated, please specify.
6. Tank Has Been Issued Fire Safety Approval or Permit - Indicate whether the tank has been approved or permitted by the Pennsylvania State Police, Fire Marshal Division; or local agency under their jurisdiction for fire safety.
7. Registration Fee - Determine registration fee due PER TANK as indicated below. A registration fee is NOT required for tanks permanently out of use.
   - A. Aboveground tanks
     1. Up to and including 5,000 gallons - $50 per tank
     2. 5,001 to and including 50,000 gallons - $125 per tank
     3. Greater than 50,000 gallons - $300 per tank
   - B. Underground Tanks - $50 per tank

Record the total registration fee due for all aboveground tanks in the space provided (A). Record the total registration fee due for all underground tanks in the space provided (B). Record the total registration fee due for all aboveground and underground tanks in the space provided (A + B). Submit a check or money order, for the total registration fee due, **made payable to: Dept. of Environmental Resources.**

tion VI. Certification - This section is to be completed by the OWNER. Please type or print the name and official title of the OWNER. The OWNER must also sign and record the date the application was examined.

tion VII. Nameplate Information - Complete this section for each aboveground tank greater than 5,000 gallon capacity. Use the same Tank Registration Number as identified in Section VI.

ASE SEND COMPLETED ORIGINAL FORM AND CHECK TO: **PA Department of Environmental Resources**
Bureau of Water Quality Management
Registration of Storage Tanks
(and the appropriate address below, depending on where your FACILITY is located)

New Hope Street town, PA 19401 **Counties** Bucks, Chester, Delaware, Montgomery, Northampton, phia,	90 East Union Street - 2nd Floor Wilkes-Barre, PA 18701 **Counties** Carbon, Lackawanna, Luzerne, Monroe, Pike, Schuylkill, Susquehanna, Wayne, Wyoming,	One Ararat Blvd. Harrisburg, PA 17110 **Counties** Adams, Bedford, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry, York	200 Pine Street Williamsport, PA 17701 **Counties** Bradford, Cameron, Centre, Clinton, Clearfield, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga, Union	Highland Bldg. - 6th Floor 121 South Highland Mall Pittsburgh, PA 15206 **Counties** Allegheny, Armstrong, Beaver, Cambria, Fayette, Greene, Indiana, Somerset, Washington, Westmoreland	1012 Water Street Meadville, PA 16335 **Counties** Butler, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Venango, Warren

OWNER INFORMATION

ner Name INTERNATIONAL PAPER COMPANY

Identification No. 13-0872805-2

ling Address 2100 E. BYBERRY RD.

PHILADELPHIA State PA Zip 19116

nty PHILADELPHIA Phone No. (215) 698-4126

III. FACILITY INFORMATION

Facility Name INTERNATIONAL PAPER COMPANY

Facility Identification No. 5-115391

Street Address (P.O. Box not acceptable) 2100 E. BYBERRY RD

City PHILADELPHIA State PA Zip 19116

County PHILADELPHIA Township

TYPE OF OWNER (Mark only one)

- Federal Government
- ☒ Corporate
- State Government
- ☐ Private
- Local Government

IV. TYPE OF FACILITY (Mark only one, if applicable)

- ☐ Farm
- ☐ Municipal
- ☐ Residential

cility Identification No. 5-115391 Facility Name INTERNATIONAL PAPER CO.

V. DESCRIPTION OF STORAGE TANKS (Complete for each regulated storage tank at this location)

ABOVEGROUND TANKS

TANK REGISTRATION NUMBER			STATUS	DATE OF INSTALLATION MO	YR	CAPACITY (GALLONS)	SUBSTANCE (CURRENTLY OR LAST STORED)	CERCLA NAME AND CAS NUMBER	OTHER SUBSTANCE NAME	FIRE SAFETY PERMIT	REGISTRATION FEE	STATE USE ONLY
		A										
		A										
		A										
		A										
		A										
		A										
		A										
		A										
		A										
		A										

TOTAL ABOVEGROUND TANK FEE (A)

UNDERGROUND TANKS

TANK REGISTRATION NUMBER			STATUS	DATE OF INSTALLATION MO	YR	CAPACITY (GALLONS)	SUBSTANCE (CURRENTLY OR LAST STORED)	CERCLA NAME AND CAS NUMBER	OTHER SUBSTANCE NAME	FIRE SAFETY PERMIT	REGISTRATION FEE	STATE USE ONLY

TOTAL UNDERGROUND TANK FEE (B)

TOTAL ABOVEGROUND & UNDERGROUND TANK FEE (A+B)

KEY FOR COMPLETION OF SECTION V.

Status

- C Currently in Use
- T Temporarily Out of Use
- P Permanently Out of Use

Substance Currently or Last Stored

- A Gasoline
- B Diesel
- C Gasohol
- D Kerosene
- E Heating Oil
- F New Motor Oil
- G Used Motor Oil
- H Aviation
- I Hazardous Substance
- J Other
- K Unknown
- L Mixture

Fire Safety Permit

- Y Yes
- N No

VI. CERTIFICATION (Read and Sign after completing all sections)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, nd that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is ue, accurate, and complete. This registration is conditioned upon compliance with provisions of the Storage Tank and Spill Prevention Act, with y regulations and orders issued pursuant to this Act, and with the requirements for obtaining a permit required under this Act.

Name and Official Title of Owner	Signature	Date Signed
ames J. Chartrand, Plant Manager	J. J. Chartrand	10/31/89